



Shawn P. Naunton
PARTNER
Zuckerman Spaeder LLP
snaunton@zuckerman.com
646.746.8655

December 21, 2018

VIA ECF

Honorable Dora L. Irizarry
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: ***Weiss, et al. v. National Westminster Bank Plc, 05-cv-4622***
Applebaum, et al. v. National Westminster Bank Plc, 07-cv-916
Strauss, et al. v. Crédit Lyonnais, S.A., 06-cv-702
Wolf, et al. v. Crédit Lyonnais, S.A., 07-cv-914

Dear Chief Judge Irizarry:

We write on behalf of all Plaintiffs in an effort to clarify certain issues relating to the Stipulations and [Proposed] Orders filed in these actions on December 18, 2018. (*Weiss* Dkt. No. 409; *Applebaum* Dkt. No. 281; *Strauss* Dkt. No. 474; *Wolf* Dkt. No. 354). We apologize that we were not clear about these facts in the filed Stipulations and [Proposed] Orders.

The sole purpose of the Supplemental Complaints that Plaintiffs seek to file is to place before the Court the timely claims of new Plaintiffs who recently retained counsel in these actions before the statute of limitations governing their claims expires on January 1, 2019. All of these new Plaintiffs are family members of existing Plaintiffs.¹ The addition of these new Plaintiffs would not implicate any new terror attacks beyond those already at issue, nor would these new Plaintiffs be asserting new or different claims than the existing Plaintiffs are already

¹ The new Plaintiffs are identified in the filed Stipulations. They are Aharon Miller, Shani Miller, Adiya Miller, Peter Steinherz, Laurel Steinherz, Joseph Ginzberg, Temima Steinherz, Joseph Cohen, Ephriam Bluth, individually and as the Legal Representative of Shoshana Bluth, Tsipora Batya Bluth Reicher, Isaac Menachem Bluth, Yigal Amichai Bluth, Aryeh Yehuda Bluth, Chanina Samuel Bluth, Abraham Aharon Bluth, Joseph Shimshon Bluth, Nathan Pam, Raziell Pam, Neemah Pam Fisher, Baruch Tratner, Judith Tratner, Drora Wizner, Rivka Selzer, and Belka Gez.

HONORABLE DORA L. IRIZARRY
UNITED STATES DISTRICT JUDGE
DECEMBER 21, 2018
PAGE 2

asserting. In addition, pursuant to the filed Stipulations, there will be no additional briefing regarding these Plaintiffs. The only thing that would change is that the cases would involve twenty-four additional Plaintiffs.

The parties sought to proceed by filing Supplemental Complaints in an effort to lessen the administrative burden on the Court of filing new and related actions that allege identical facts for the same families as those already alleged in these actions, and also to lessen the cost to the parties attendant to filing and responding to new and related actions.

In light of the foregoing, Plaintiffs respectfully request that the Court reconsider its orders striking Plaintiffs' Stipulations and [Proposed] Orders. We thank the Court for its courtesy and consideration.

Respectfully submitted,

/s/ Shawn P. Naunton

cc: All Counsel